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Attorneys for State of Montana

FLATHEAD DISTRICT COURT
2010 DEC 15 PM 4:07

FILED
BY _____
DEPUTY

MONTANA ELEVENTH JUDICIAL DISTRICT COURT, FLATHEAD COUNTY

STATE OF MONTANA,

Plaintiff,

vs.

TIMOTHY SHAWN PERRY,

Defendant.

Cause No. DC-10-456C

STEWART E STADLER

INFORMATION

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The State of Montana, by and through the Flathead County Attorney's Office, having first obtained leave of the Court, files this information accusing the above-named Defendant, TIMOTHY SHAWN PERRY, of having committed the following offense:

COUNT I

That from on about July 13, 2009, until on or about July 15, 2009, in Flathead County, Montana, the defendant committed the offense of INSURANCE FRAUD/THEFT, a FELONY in violation of Mont. Code Ann. §§ 33-1-1202(1)-(2) and 45-6-301(6)(a).

The facts constituting this offense are as follows:

That at the times and place mentioned above, the defendant, for the purpose of obtaining any money or benefit, presented or caused to be presented, or did purposely or knowingly assist, abet, solicit, or conspire with another to make to an insurer a statement, containing false, incomplete, or

1 misleading information concerning any fact or thing material to, as part of, or in support of a claim
2 for payment or other benefit exceeding \$1,500 in value pursuant to an insurance policy or contract.

3 Specifically, on or about July 9, 2009, the defendant was hit in a car accident by Matthew
4 Patrick Gillespie ("Gillespie") who was without insurance coverage at the time of the accident.
5 Subsequently, Gillespie added his vehicle to his wife's Safeco Insurance Company ("Safeco") policy
6 on July 13, 2009. Thereafter, the defendant filed a claim with Safeco claiming that the accident
7 occurred on July 14, 2009, in order to fraudulently obtain money from Safeco. Safeco paid the
8 defendant \$7,964.31 for damages to his vehicle.
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10 Pursuant to Mont. Code Ann. § 45-6-301(8)(b)(1), the offense is punishable by a fine not to
11 exceed \$50,000.00 and/or imprisonment in the state prison for a term not to exceed 10 years.
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13 A list of possible witnesses for the State now known to the prosecution is as follows:

14 Bryan D. Stanley, Insurance Fraud Investigator, State Auditor's Office, Helena, Montana
15 John Hayes, Safeco Investigator, Liberty Lake, Washington
16 Laurie Ince, Safeco Adjuster, Liberty Lake, Washington
17 Scott Meyer, Probation and Parole Officer, Kalispell, Montana
18 Officer Alt, Probation and Parole, Kalispell, Montana
19 Matthew Patrick Gillespie, Bigfork, Montana
20 Timothy Shawn Perry, Kalispell, Montana
21 Gina Martel, Safeco employee, Spokane, Washington
22 Penny Coe, Safeco employee, Indianapolis, Indiana
23 Chandra Crisp, Geico employee, Scottsdale, Arizona
24 Possible other Safeco and/or Geico employees
25 Any witnesses called by the defendant
26 Any rebuttal witnesses
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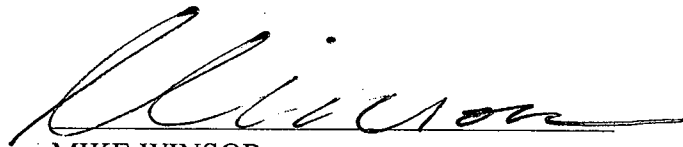
1 STATE OF MONTANA)

2 :ss.

3 County of Lewis and Clark)

4 MIKE WINSOR, having been first duly sworn, states that he is a Special Deputy County
5 Attorney for the County of Flathead, state of Montana, and that based on information and belief,
6 states that the facts stated in the foregoing Information are true and that the defendant is guilty of the
7 offense as charged.

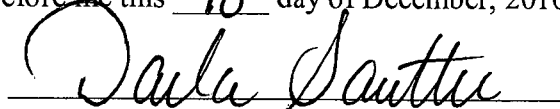
8 DATED this 9th day of December, 2010.
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13 MIKE WINSOR

14 Special Deputy Flathead County Attorney
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16 SUBSCRIBED AND SWORN TO before me this 10 day of December, 2010.
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